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Ref: 8EPR-N

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Walter C. Waidelich, Division Administrator
Federal Highway Administration
2520 West 4700 South
Suite 9A
Salt Lake City, UT 84118

John Njord, Executive Director
Utah Department of Transportation
4105 South 2700 West
Salt Lake City, UT 84119

Re: Comments on Geneva Road Transportation Improvements (SR-114) in Provo to State St. (SR-89) in Pleasant Grove: Draft Environmental Impact Statement (DEIS): CEQ#: 20080479

Dear Messrs: Waidelich and Njord:

In accordance with our responsibilities under the National Environmental Policy Act (NEPA) 42 U.S.C. Section 4231 et. seq., and Section 309 of the Clean Air Act, 42 U.S.C. Section 7609, the U.S. Environmental Protection Agency Region 8 (EPA) has reviewed the Geneva Road Transportation Improvements (SR-114) in Provo to State Street (SR-89) in Pleasant Grove Draft Environmental Impact Statement (DEIS).

The Geneva Road DEIS identifies and evaluates improvements to two major roadways, Geneva Road and a portion of Provo Center Street. Both roadways are part of SR-114 and are referred to collectively as "Geneva Road." The project begins at the intersection of Provo Center Street and I-15 and continues west along Center Street to Geneva Road, then north along Geneva Road to State Street (SR-89) in Pleasant Grove. The project study area includes portions of Provo, Orem, Vineyard, Lindon, and unincorporated Utah County between I-15 on the east and Utah Lake on the west.

The primary purpose of the Proposed Action is to improve regional and local traffic mobility for north-south travel in central Utah County, with secondary purposes of increasing safety by correcting design deficiencies and enhancing opportunities for intermodal facilities on

Geneva Road by providing a cross-section that can better accommodate mass transit (buses), bicycles, pedestrians, trails, and other alternative modes of travel.

The DEIS analyses three alternatives which examine three-, five-, and seven-lane widening of the corridor. All three alternatives include a permissive left-turn lane, shoulders adequate
for bus pullouts and bicyclist use, curbs and gutters, park strips, a sidewalk on one side, and a multi-use trail on the other side. The major difference among the alternatives is the addition of travel lanes in each direction.

EPA has reviewed the DEIS and has concerns regarding the disclosure of the air quality analysis. Specifically, EPA recommends that the report clarify the contribution of Vehicle Miles Traveled (VMT) from this project with respect to County-wide VMT and re-evaluate the need for quantitative analysis for emissions of particulate matter ($PM_{2.5}$), PM_{10}, carbon monoxide (CO), volatile organic carbon (VOC), and nitrous oxide (NOx). In addition, EPA recommends that the report include a discussion of potential for nonattainment for the 2008 ozone standard and the nonattainment status of the $PM_{2.5}$ standard. The enclosed "Detailed Comments" provide more discussion of our concerns.

Pursuant to EPA policy and guidance, EPA rates the environmental impact of an action and the adequacy of the NEPA analysis. EPA has rated the action alternative and options as "EC-1" (Environmental Concerns-Adequate). This "EC" rating means that impacts have been identified that should be avoided in order to fully protect the environment. Specifically, the need for quantitative analysis for emissions of $PM_{2.5}$, PM_{10}, CO, VOC, and nitrous oxide (NOx) should be re-evaluated as stated above. The "1" rating means that no further analysis or data collection is necessary, but clarifying language or information may be necessary. An explanation of the rating criteria is enclosed.

EPA appreciates the opportunity to review this project. We also acknowledge the complexities in designing a highway such as this one in a manner that meets the purpose and need, considers and mitigates environmental impacts and attempts to meet the needs of the local communities. If you have any questions or would like to discuss our comments, please contact me at (303) 312-6004 or Robin Coursen of my staff at (303)312-6695.

Sincerely,

Dana B. Allen for

Larry Svoboda
Director, NEPA Program
Office of Ecosystems Protection and Remediation

Enclosure

cc: Ed Woolford, FHWA (email)
Philip Huff, UDOT
Betsy Herrmann, U.S. Fish and Wildlife Service (email)
Jason Gipson, U.S. Army Corps of Engineer (email)

GENEVA ROAD EIS
DETAILED COMMENTS

General Comments

- EPA has appreciated working closely with UDOT and FHWA on early scoping and alternatives development for this project. We acknowledge the design effort to enhance opportunities for intermodal facilities on Geneva Road by providing a cross-section that can better accommodate mass transit (buses), bicycles, pedestrians, trails, and other alternative modes of travel, all of which will reduce vehicle miles travelled and greenhouse gas emissions.

- The numbering for the tables in the text for Chapter 3 does not match the numbering on the specific tables.

- Mitigation – Even though the direct effects of the UDOT Preferred Alternative may not substantially affect regional air quality, EPA recommends that this section discuss actions that State, Federal or local governments can take to improve ambient air quality. The indirect effects of highway expansion along with other reasonably foreseeable future actions could significantly impact regional air quality. Actions such as the building of bike paths, pedestrian walkways, and the development of pedestrian-friendly shopping centers can help reduce air emissions associated with vehicles by enticing people to leave their cars at home.

Air Quality

Vehicle Miles Traveled/Quantitative Analysis

The level of VMT associated with this project appears to be a substantial portion of Utah County's VMT currently and as projected in 2030. Although information is provided from the Mountainland Association of Governments (MAG) in Table 3-12 with regard to County-wide NOx and PM_{10} emissions, it is unclear for the public as to the contribution from this project. Table 3-14 presents daily VMT for Geneva Road of 4,714,000 for 2006 and 7,366,000 for 2030. MAG's 2030 Regional Transportation Plan (RTP) (Appendix B, Page 20) shows County-wide VMT of 9,934,155 for 2005 and 17,891,706 for 2030. If this is the case, we conclude that the Geneva Road VMT are a substantial portion of Utah County's VMT currently and as projected in 2030. MAG's 2030 RTP Appendix B link is provided below:

http://www.mountainland.org/Transportation_Plans/2007_Regional_Transportation_Plan/Document/Conformity%20Determination.pdf

Based on the above observation, it appears that this project *does* cross the threshold of a "project of air quality concern" and may involve a significant increase in diesel vehicles in the area. This judgment would not support a determination that estimates can be made by reference to air quality studies in the area and that a quantitative analysis is not needed. EPA recommends that

the report clarify the contribution of VMT from this project with respect to County-wide VMT and re-evaluate the need for quantitative analysis for $PM_{2.5}$, PM_{10}, CO , VOC, and NOx.

Attainment Status

- Pg. 3-49, Section 3.8.1 Attainment Status of Study Area – We recommend that this section be revised and expanded to discuss all of the National Ambient Air Quality Standards (NAAQS) as presented in 40 CFR 50.4 through 50.15 with relevance to the study area (also see http://www.epa.gov/air/criteria.html). In particular, the potential for nonattainment for the 2008 ozone standard and the nonattainment status of $PM_{2.5}$ standard should be included. On December 22, 2008, EPA's Administrator signed a final rule and issued designations of attainment and nonattainment for the 2006 24-hour $PM_{2.5}$ NAAQS. The study area is included in the Provo-Orem UT 24-hour $PM_{2.5}$ NAAQS nonattainment area. The final rule for these designations will be published shortly in the Federal Register.

  In addition, EPA's Administrator signed the final rule for the new 8-hour ozone NAAQS (0.075 ppm) on March 12, 2008 and the final rule was published on March 27, 2008 (see 73 FR 16436.) Final designations for the NAAQS are scheduled for March, 2010. Please also note that the Lead (Pb) NAAQS was revised by EPA's Administrator on October 15, 2008 and a final rule was published in the Federal Register on November 12, 2008 (see 73 FR 66964).

- Pg. 3-50, second paragraph, first sentence and third paragraph first sentence which state; "Utah County, Utah which is in an EPA-designated maintenance area for PM_{10}" This statement is incorrect. Although the State may have previously submitted a redesignation and maintenance plan for this area for PM_{10}, the area retains its legal designation of nonattainment until EPA approves such SIP revision and publishes a final rule in the Federal Register.

- Pg. 3-53, second paragraph, fourth sentence; EPA's Administrator signed the final rule Federal Register action for the 24-hour $PM_{2.5}$ NAAQS nonattainment/attainment designations on December 22, 2008. The final rule will be published shortly; therefore, final designations will be complete in 2009 and a SIP revision from the State will be due in 2012 (not as stated as 2010 and 2013 respectively).

- Pg, 3-53; first sentence under the Regional CO analysis; the Provo area is a maintenance area for CO (not nonattainment).

- Pg. 3-54, Table 3-13; The CO hotspot analysis is appropriate for this project; however, for the public's information, the Final EIS (FEIS) should include the project's CO emissions and a comparison to the CO emission budgets contained in the Provo CO EPA-approved maintenance plan. Also in Table 3-13, it is unclear how the "Background Levels" relate to the modeled results. The background levels for both the 1-hour and 8-hour CO values are in some instances higher than the modeled results. These values

appear to either be misstated or incorrect.

- Pg. 3-54, paragraph under "*Local*" (for the O_3 Analysis), end of the second sentence which states "especially Salt Lake and Davis Counties which are non-attainment areas for O_3." Salt Lake and Davis Counties are in a maintenance area for the prior 1-hour ozone NAAQS, they are designated as attainment for the prior 0.08 ppm 8-hour ozone NAAQS, and the State will be submitting recommended designations for the 0.075 ppm 8-hour NAAQS in March, 2009.

Mobile Source Air Toxics

- Page 3-55, Mobile Sources Air Toxics (MSAT) section: EPA has made its disagreements with regard to FHWA guidance and its inclusion in many transportation project EISs, known over the last few years. We continue to disagree with many of the statements in this mobile sources air toxics section such as technical shortcomings of current EPA regulatory models. We do note that much of this language is included from earlier transportation EISs; however, we note that Table 3-15 of the document does contain relevant information regarding MSAT emissions data. We recommend that the FEIS include a table containing a list of potential MSAT receptors (i.e., schools, churches, hospitals, etc.) adjacent to the Geneva Road project.

Cumulative Impacts

- Page 3-183. Utah County has been redesignated for CO as a maintenance area and has a redesignation request and maintenance plan submitted to EPA for approval, for the 24-hour PM_{10} NAAQS. Utah County is, however, in violation of the 2006 24-hour $PM_{2.5}$ NAAQS. This is a concern for public health as $PM_{2.5}$ is generated from sources that include all types of combustion, including motor vehicles and particularly diesel exhaust.

- Pg. 3-184, under "Past Trends" graphs of ambient air quality data; for a more complete disclosure of air quality data for Utah County and the project area, we suggest also including graphs depicting ambient air quality data for the 2006 24-hour (35 $\mu g/m^3$) $PM_{2.5}$ NAAQS and the 2008 8-hour (0.075 ppm) ozone NAAQS. Also, we suggest updating all the graphs through 2007 as quality-assured and State-certified data are available. This information would be valuable to the public as Utah County has shown violations of the 24-hour $PM_{2.5}$ NAAQS for 2004-2006 and 2005-2007.

Greenhouse Gases

EPA believes that the discussion in Section 3-171 (Energy) that calculates the differences in energy consumption between the UDOT preferred alternative and the No Action is helpful. Further, the discussion of greenhouse gas emissions resulting from transportation sources is presented on page 3-193 (Cumulative Effects-Energy) and includes a beneficial table that describes and discloses the relationship of current and projected Utah highway emissions to total global carbon dioxide emissions. Inclusion of project corridor VMT relative to statewide travel activity depicts the project in a global perspective for carbon dioxide emissions.

Water Resources

The EIS estimates that the project could result in an increase in the 10-year peak flow from 118 cubic feet per second (cfs) to 188 cfs with the corresponding increase in impervious surface from 65 to 95 acres. Therefore, as proposed, the Geneva Road expansion could cause water quality impacts resulting from the increase in impervious surfaces within and immediately adjacent to the project corridor. EPA notes that the need for 10-year peak flow modeling may not be necessary, rather modeling for 2-year, 24 –hour flood events would be sufficient. These 2-year, 24-hour events would represent the majority of potential pollutant loading from the newly developed impervious surfaces.

In order to mitigate the need for many additional large capacity (volume) stormwater detention structures, the projected increase in flow could, instead, be more substantially *detained* to result in a net decrease in flow rate. The additional stormwater detention structures could be designed to capture and detain, retain, or infiltrate 10 percent of the highway runoff from the 2-year, 24-hour event.